<div align="center">**REMARKS**</div>

1. **Summary of the Office Action**

   In the office action mailed October 8, 2010, the Examiner rejected claims 1, 4-5, 7-8, 10, and 13-24 under 35 U.S.C. § 102(b) as being unpatentable over United States Patent Pub. No. 2003/0088693 (Cheung), rejected claims 2-3 and 11-12 under 35 U.S.C. § 103(a) as being unpatentable over Cheung in view of AAPA, and rejected claims 6 and 15 under 35 U.S.C. § 103(a) as being unpatentable over Cheung in view of United States Patent Pub. No. 2002/0009986 (Bern). The Examiner objected to claims 9 and 16-19 as being dependent upon a rejected base claim, but would otherwise be allowable if rewritten into independent form.

2. **Status of the Claims**

   Applicants have amended claims 1-3, 5, 7-12, 14, and 16 in order to clarify the terms of the claims. Claims 17-19 are currently canceled. New claims 20-23 are currently added. Accordingly, presently pending are claims 1-16 and 20-23, of which claims 1, 7, 8, and 10 are independent, and the remainder dependent.

3. **Response to Rejections**

   i. **The Examiner's rejection of Claims 1, 4-5, 7-8, 10, and 13-14 should be withdrawn.**

   The Court of Appeals for the Federal Circuit has held that "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As discussed more fully in the following sections, Applicants submit that the Cheung reference does not anticipate each and every element of the currently claimed invention as set forth in the amended independent claims 1, 7, 8, and 10.

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First, the Cheung reference does not disclose a "system for handling email requests received from a terminal for sending email from and receiving email by the terminal." In fact, the Office Action does not even address the portion of the claim reciting "…and receiving email by the terminal" in the last Office Action (See page 2 of the Office Action), and instead focuses only on the "…for sending email from" portion of the claim. Applicants respectfully submit that Cheung does not disclose anything about receiving emails from an email server on behalf of a terminal at an email proxy. Rather, the Cheung reference is directed to an intermediate web server 102 device that is configured to **generate** and **send** support request e-mails as a function of information entered into a web-form at the web server 102. There is no disclosure in Cheung regarding a capability of web server 102 to receive an email request from the terminal (104 in Figure 1 of Cheung) for receiving emails from email servers 110, 112.

For at least this reason, Applicants respectfully submit that the Examiner's rejection of independent claims 1, 7, 8, and 10 can not be maintained, and should be withdrawn.

Second, the Cheung reference does not disclose "a database…comprising **user-specific email communication configuration settings for sending and receiving email** to and from an email server on behalf of the terminal" (claim 1, and similar limitations in claims 7, 8, and 10). As set forth in paragraph [0026] of Cheung, "database 103 may include information about such user, such as the **user's name, address, telephone number, product purchased**, etcetera." Applicants respectfully submit that none of "the user's name, address, telephone number, [and] product purchased" is equivalent to the recited "user-specific email communication configuration settings for sending and receiving email."

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Furthermore, Cheung is directed to generating and sending support request e-mails as a function of information entered into a web-form at the web server, and does not disclose any function of sending and/or receiving email with an email server **on behalf of the terminal**.

For at least these reasons also, Applicants respectfully submit that the Examiner's rejection of independent claims 1, 7, 8, and 10 can not be maintained, and should be withdrawn.

Third, the Cheung reference does not disclose the receipt by the web server 102 of an email request containing "non-user-specific email communication configuration settings," as variously recited in the amended independent claims 1, 7, 8, and 10. In fact, Cheung discloses that web server 102 generates its own email upon user activation of a submit button (See paragraph [0027] of Cheung), and thus necessarily fails to disclose receipt of an email request in the first instance, let alone one that contains "non-user-specific email communication configuration settings," as recited by the claims.

For at least this reason also, Applicants respectfully submit that the Examiner's rejection of independent claims 1, 7, 8, and 10 can not be maintained, and should be withdrawn.

Fourth, the Cheung reference fails to disclose detecting "a unique network address of the terminal." The last Office Action relied upon the disclosure in paragraphs [0026-0027] of Cheung that discloses a database 103 that may store a telephone number associated with a user, and include into a subsequently-generated email a copy of that telephone number. A **telephone number** of a **user loaded from a database**, however, is not equivalent to **detecting a network address** of a **terminal**. More specifically, a user is not equivalent to a terminal device, a telephone number of the user is not equivalent to a network address of the terminal device, and loading from a database is not equivalent to detecting. In fact, Cheung itself discloses network

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addresses of the email servers 110 and 112 (see paragraph [0027]), and at no point identifies the telephone number of a user as an example of, or equivalent to, a network address.

For at least these reasons also, Applicants respectfully submit that the Examiner's rejection of independent claims 1, 7, 8, and 10 can not be maintained, and should be withdrawn.

Fifth, the Cheung reference fails to disclose the retrieval of user-specific email communication configuration settings from the database "**using the unique network address of the terminal**." More specifically, the last Office Action already relied upon the telephone number stored in database 103 as an example of "a unique network address." It is not clear then, since the telephone number is already disclosed as stored in database 103, how the telephone number is then used to access the database 103 to retrieve email configuration settings. Applicants respectfully submit that the telephone number of Cheung can not be construed in one way to read on one element of the disclosed claim, and then construed in another entirely different and inconsistent way to read on another element of the disclosed claim. Furthermore, and as noted above already, the telephone number disclosed in Cheung is associated with the user, **not** with the terminal. Cheung thus fails to disclose the retrieval of user-specific email communication configuration settings from the database "using the unique network address **of the terminal**."

For at least this reason also, Applicants respectfully submit that the Examiner's rejection of independent claims 1, 7, 8 and 10 can not be maintained, and should be withdrawn.

Specifically regarding dependent claims 4-5, and 13-14, Applicants submit that these claims are also in condition for allowance for at least the reason that these claims inherit all of the limitations of their respective base claims 1 and 10, now in condition for allowance.

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In specific regard to the Examiner's rejection of claims 2-3 and 11-12 under 35 U.S.C. § 103(a) in view of Cheung and AAPA, Applicants submit that the references can not be combined in the manner asserted by the Examiner. Cheung is specifically directed to a technical / user-support system in which a web server 102 can generate and send e-mails to a proper inside support specialist at a proper geographic location. There is simply no reasonable or logical explanation for incorporating e-mail settings required only for communicating with user-specific email accounts and servers (e.g., requiring a username, password, name of email server, or email address of the user to access), when such services and systems are not supported in Cheung and would not provide any advantage in Cheung. Furthermore, and counter to the Office Action's stated motivation to combine (see page 5 of the Office Action), Cheung fails to disclose any "email retrieval" function at all, and simply has no logical reason to do so, given the goal of the devices and methods disclosed in Cheung.

For at least this reason, Applicants respectfully submit that the Examiner's rejection of claims 2-3 and 11-12 can not be maintained, and should be withdrawn.

In specific regard to the Examiner's rejection of claims 6 and 15 under 35 U.S.C. § 103(a) in view of Cheung and Bern, Applicants submit that the references can not be combined in the manner asserted by the Examiner. As noted above, Cheung is specifically directed to a technical / user-support system in which a web server 102 can generate and send e-mails to a proper inside support specialist. There is simply no reasonable or logical explanation for incorporating an email proxy for retrieving e-mails in Cheung. Furthermore, and counter to the Office Action's stated motivation to combine (see page 6 of the Office Action), Cheung fails to disclose any "email retrieval" function, and simply has no logical reason to do so, given the goal of the devices and methods disclosed in Cheung.

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For at least this reason, Applicants respectfully submit that the Examiner's rejection of claims 6 and 15 can not be maintained, and should be withdrawn.

4. Conclusion

For all the above reasons, Applicants respectfully submit that all claims are in condition for allowance over the cited art of record and respectfully request a Notice of Allowance. Should the Examiner have any questions about this matter, the Examiner is invited to call the undersigned at (312) 913-2125.

Respectfully submitted,
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